

Claims 1-7, 11, and 12 and stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nishimura (US 2001/0002829) in view of Youn (US 5,856,816), claims 8 and 9 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nishimura in view of Youn and Applicants' Prior Art, and claims 14 and 15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nishimura in view of Youn and Gooding et al. (US 4,580,265). Applicants respectfully traverse these rejections as being based upon references that neither teach nor suggest each feature recited in independent claims 1 and 11.

Independent claim 1 recites a liquid crystal display including a first data polarity inversion driver determining whether a first data transition is occurred in first data of input data and a second data polarity inversion driver determining whether a second data transition is occurred in second data of the input data, "wherein the first data is odd-numbered bits in the input data and the second data is even-numbered bits in the input data." Similarly, independent claim 11 recites a method of driving a liquid crystal display including "dividing input data by first and second data," wherein "the first data is odd-numbered bits of the input data and the second data is even-numbered bits of the input data."

In contrast to the Applicants' claimed invention, Nishimura teaches a drive circuit for a liquid crystal display device, wherein each data BUS-A1 to A24 is connected to odd-numbered SD3-1, 3, 5, 7, and 9 among SD3-1 through SD3-10 through respective 24-bit width bus lines, and each data BUS-C1 to C24 and BUS-D1 to D24 are connected to even-numbered SD3-1, 4, 6, 8, and 10 among SD3-1 through SD3-10 through respective 24-bit width bus lines. In addition, Youn teaches data latches that latch odd/even data portions *external from* a drive IC. Accordingly, Applicants respectfully assert that Youn fails to remedy the deficiencies of Nishimura. For example, as taught by Youn, one horizontal line of

display data is stored in one of odd and even second line latches during one LOAD signal. Then, the line data in the odd and even second line latches selects a corresponding voltage of two reference voltages by D/A converters. Accordingly, Applicants respectfully assert that the latching configuration taught by Youn would actually change the principle of operation of the driver circuit of Nishimura.

As MPEP 2143.01 instructs, “[I]f proposed modification would render the prior art invention being modified unsatisfactory for its intended purpose, then there is no suggestion or motivation to make the proposed modification. *In re Gordon*, 733 F.2d 900, 221 USPQ 1125 (Fed. Cir. 1984).” Furthermore, MPEP 2143.01 instructs, “[i]f the proposed modification or combination of the prior art would change the principle of operation of the prior art invention being modified, then the teachings of the references are not sufficient to render the claims *prima facie* obvious. *In re Ratti*, 270 F.2d 810, 123 USPQ 349 (CCPA 1959).” Accordingly, because modifying Nishimura with the teachings of Youn would fail to provide polarity inversion drivers that invert polarities of odd and even data, Applicants respectfully assert that the Office Action has not established any proper motivation to modify Nishimura with Youn, and thus not established a *prima facie* case of obviousness.

Furthermore, Applicants respectfully assert that the Office Action fails to rely upon Gooding et al. to remedy the deficiencies of Nishimura and Youn. Moreover, Applicants respectfully assert that Gooding et al. cannot remedy the deficiencies of Nishimura and Youn.

For at least the above reasons, Applicants respectfully submit that independent claims 1 and 11 are neither taught nor suggested by Nishimura, Youn, Gooding et al., and/or Applicants’ Prior Art FIGs. 1-5, whether taken alone or in combination. Thus, Applicants respectfully assert that the rejections under 35 U.S.C. § 103(a) should be withdrawn because

the above-discussed novel combination of features are neither taught nor suggested by any of the applied references.

CONCLUSION

In view of the foregoing amendments and remarks, Applicants respectfully request entry of the above amendments, reconsideration, and the timely allowance of the pending claims. Should the Examiner believe that there are any issues outstanding after consideration of this response, the Examiner is invited to contact Applicants' undersigned representative to expedite prosecution.

If there are any other fees due in connection with the filing of this response, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted,

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